



TRW Inc.

Executive Offices
1900 Richmond Road
Cleveland, OH 44124

Carl G. Miller
Executive Vice President &
Chief Financial Officer

2001-014-617

June 27, 2001

General Services Administration
FAR Secretariat (MVR)
Attention: Ms. Laurie Duarte
1800 F. Street N.W., Room 4035
Washington, D.C. 20405

Re: FAR Case 2001-014, Proposed Revocation of the Final Rule on Contractor Responsibility

Dear Ms. Duarte:

I am writing in support of the proposed revocation of the currently stayed Final Rule commonly known as the "blacklisting" rule. As a finance professional, who has worked for federal contractors, I believe that this regulation is unnecessary, punitive and subject to inconsistent application based on vague and undefined criteria.

As I understand the regulation, it grants individual contracting officers an excessive degree of subjective judgment based upon undefined criteria in making responsibility determinations. The regulation fails to clearly define critical concepts such as what constitutes "relevant credible information" that a contracting officer may consider. As a result of the aforementioned subjectivity and other items, the procurement process is likely to get bogged down in increased protests and litigation.

Further, the regulation's certification requirement is contrary to the Government's acquisition streamlining initiatives. The implementation of yet another requirement for certification will result in additional costs to both the contractor and government as well as serve as a disincentive to new entrants into the government contract arena.

Existing regulations provide the Government ample opportunity to assess and act on a contractor's record of ethics and business integrity. These regulations require contracting officers to assess the contractor's integrity and business ethics as part of the responsibility determination. The separate suspension and debarment

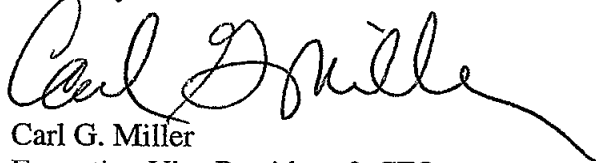
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process allows the Government to take action against contractors that engage in illegal or unethical behavior. No government interest is served by the additional "blacklisting" regulation

I appreciate the opportunity to express my support of the proposed revocation of the blacklisting regulation and trust that my opinion will be given due consideration.

Sincerely,

A handwritten signature in cursive script, appearing to read "Carl G. Miller". The signature is fluid and extends to the right with a long, sweeping tail.

Carl G. Miller
Executive Vice President & CFO

cc: Phil Odeen